



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

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December 31, 1996

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Program Management

Reply To
Attn Of: HW-113

Nolan R. Jensen, Acting Manager
Environmental Restoration Program
Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: Comments on: Draft OU 10-04 Comprehensive RI/FS Statement of
Work (SOW) - (OPE-ER-171-96).

Dear Mr. Jensen:

Enclosed are the EPA comments on the subject Statement of
Work. If you have any questions, please contact me at
206-553-8633.

Sincerely,

Richard Poeton, WAG 10 Manager

encl

cc: S. Rosenberger, IDHW, 900 N. Skyline, Idaho Falls, ID,
83402, w/encl
D. Nygard, IDHW, 1410 N. Hilton, Boise, ID 83706, w/encl
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W. Pierre, ECL-113, w/encl

EPA Comments on: Draft OU 10-04 Comprehensive RI/FS Statement of Work (SOW) - (OPE-ER-171-96).

1. Section 3.1

It is not clear that WAG 10 has been "redefined" relative to the FFA/CO. With the exception of the Jefferson County Plot, it appears that the definition of WAG 10 from the FFA/CO, as quoted in the second paragraph of Section 1, still applies. What this SOW is doing is specifying the contents of WAG 10 consistent with the FFA/CO.

2. Section 3.5.2

The OECERT probability calculation for UXO detonation is better characterized as part of a qualitative risk assessment. It is not a "calculated probability" in the usual risk assessment sense.

3. Figure 4

Injection wells should be included as a contaminant source for groundwater as well as ponds.

4. Section 6

The last paragraph could use some clarification on what analysis ARVFS will be excluded from. I assume it will still be evaluated for residual risk subsequent to D&D, similar to BORAX-09. In addition, it would help to clarify that STF and EBR-1 represent the only remaining facilities in WAGs 10 and 6.